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BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

Docket No. 2006-6-G

Chester County Natural Gas
Authority, Lancaster County
Natural Gas Authority,
York County Natural Gas
Authority, and Patriots
Energy Group,

Petitioners.

In Re:

Annual Review of Purchased)
Gas Adjustments and Gas)
Purchasing Policies of South)
Carolina Pipeline Corporation.)

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PSC SC MAIL / DMS

PETITION TO INTERVENE

NOW COMES Lancaster County Natural Gas Authority (hereinafter "LCNGA"), York County Natural Gas Authority (hereinafter "YCNGA"), Chester County Natural Gas Authority (hereinafter "CCNGA") and Patriots Energy Group (hereinafter "PEG") before the South Carolina Public Service Commission, Utilities Division, petitioning to intervene in the above captioned matter, on the following grounds:

1. Petitioners are special purpose districts and a joint action agency organized in accordance with South Carolina law to separately and/or jointly deliver and/or supply natural gas to

SERVICE: DE DOUBLE SERVICE:

residential, industrial and other customers located in Chester, Union, Lancaster, Kershaw, York and Cherokee Counties.

- The duly authorized representative of the Petitioners for purposes of this docket is the undersigned whose name and address appears below.
- A matter before this Commission is its Order No. 87-1122 which requires the annual review of the Purchased Gas Adjustment and the Gas Purchasing Policies of South Carolina Pipeline Corporation (together, the Issues). The Issues relate to, among other things, the price of gas sold by South Carolina Pipeline Corporation (SCPC) to Petitioners.
- Because this proceeding affects the price which Petitioners pay for gas and correspondingly, the price which Petitioners must then charge their customers, denial of the right of Petitioners to intervene would impair or impede the ability of each to protect gas prices paid and charged by them.
- Although PSC R. 103-836(3)(c) requires that the position of Petitioners on the Issues be set forth in this Petition, Petitioners are unable to formulate their position until SCPC's position on the Issues has been made known. Likewise, although the notice of hearing on the Issues requires Petitioners to notify SCPC and the PSC if Petitioners intend to offer any testimony and/or evidence at the hearing, Petitioners are unable to furnish

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any notice until SCPC has pre-filed with the PSC and served on Petitioners its proposed testimony and evidence.

803-327-7494

WHEREFORE, Petitioners hereby seek, pursuant to PSC R. 103-836 (or other applicable or analogous rule/regulation), intervention in this matter, including, but not limited to, the rights to receive copies of all notices, pleadings, discovery material and other related correspondence; to appear as a party; to offer testimony and other evidence; and to cross-examine witnesses at any hearings, in support of their position.

SPENCER & SPENCER, P.A.

By:

Vaul W. Dillingham Attorney for Petitioners S.C. Bar No.15021 P.O. Box 780

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Rock Hill, S. C.

March 31, 2006

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2006-6-G

Chester County Natural Gas Authority, Lancaster County Natural Gas Authority, and York County Natural Gas) CERTIFICATE OF SERVICE BY MAIL Authority, Petitioners. In Re: Annual Review of Purchased Gas Adjustments and Gas Purchasing Policies of South) Carolina Pipeline Corporation.)

I certify that the foregoing Petition to Intervene has been served via facsimile to the Public Service Commission at 803-896-5246 and by U.S. Mail, first-class, postage-prepaid, and to the addressees shown below via U.S. Mail, first class, postageprepaid, this 31st day of March, 2006.

Public Service Commission of SC Attn: Docketing Department PO Drawer 11649 Columbia, SC 29211

South Carolina Pipeline Corporation P.O. Box 102407 Columbia, SC 29224-2407 Attn: Mr. George Fasano, Jr. Vice President and Controller

Patricia Banks Morrison South Carolina Electric & Gas Company Legal Department - 130 Columbia, SC 29218

Wendy B. Cartledge Office of Regulatory Staff P. O. Box 11263 Columbia, SC 29211

K. Chad Burgess Willoughby & Hoefer, P.A. P. O. Box 8416 Columbia, SC 29202

SPENCER & SPENCER J P.A.

By:

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Rock Hill, S.C.

March 31, 2006